



Muriel Goode-Trufant
Acting Corporation Counsel

THE CITY OF NEW YORK
LAW DEPARTMENT
100 CHURCH STREET
NEW YORK, NEW YORK 10007

Yini Zhang
Senior Counsel
yinzhan@law.nyc.gov
Phone: (212) 356-3541

September 17, 2024

BY ECF

Honorable Valerie E Caproni
United States District Judge
Southern District of New York
500 Pearl Street
New York, New York 10007

MEMO ENDORSED

USDC SDNY
DOCUMENT
ELECTRONICALLY FILED
DOC #:
DATE FILED: 9/17/2024

Re: Thorn Lawless v. The City of New York et al. 23-CV-09106 (VEC)

Your Honor:

I am a Senior Counsel in the Office of Muriel Goode-Trufant, Acting Corporation Counsel of the City of New York. I write pursuant to Local Civil Rule 1.4 to respectfully request that the Court substitute the undersigned as counsel of record on behalf of Defendants the City of New York, Diarmuid O'Sullivan, and Daniel Magee, in place of Peter Scutero. Simultaneously herewith, I am filing a notice of substitution of counsel and an affidavit in support of this motion. Further, Defendants respectfully request that Mr. Scutero be terminated from the docket and removed as an attorney of record in this matter.

Thank you for your time and consideration of this matter.

Respectfully submitted,

Respectfully submitted,

/s/ *Yini Zhang*

Yini Zhang
Senior Counsel
Special Federal Litigation Division

cc: *Counsels of Record (BY ECF)*

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

THORN LAWLESS,

Plaintiff,

-against-

THE CITY OF NEW YORK, NYPD DEPUTY
INSPECTOR DANIEL G. MAGEE (TAX 930622),
NYPD OFFICER DIARMUID O’SULLIVAN (TAX
952078), MEMBER F/N/U ALVAREZ, AND NYPD
MEMBER DOES 1-3,

Defendants.

**NOTICE FOR SUBSTITUTION
OF COUNSEL**

23-cv-09106 (VEC)

PLEASE TAKE NOTICE that the following attorney is hereby substituted in place of PETER SCUTERO, as counsel of record on behalf of defendants City of New York, Diarmuid O’Sullivan and Daniel Magee:

Yini Zhang
Senior Counsel
New York City Law Department
100 Church Street, Room 3-178
New York, New York 10007
T: (212) 356-3541
E: yinzhan@law.nyc.gov

From this date forward, please terminate PETER SCUTERO from the docket as counsel of record and replace her with Yini Zhang.

Dated: New York, New York
September 17, 2024

MURIEL GOODE-TRUFANT
Acting Corporation Counsel of the City of New York
*Attorney for Defendants City of New York,
O'Sullivan, and Magee*

By: s/ *Yini Zhang*
Yini Zhang
Senior Counsel
Special Federal Litigation Division

cc: *Counsels of Record (BY ECF)*

Application GRANTED. The Clerk of Court is respectfully directed to terminate Peter Scutero as counsel for Defendants.

SO ORDERED.



9/17/2024

HON. VALERIE CAPRONI
UNITED STATES DISTRICT JUDGE